

Page 1

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

STALIN RODRIGO REYES ESPINOZA,

Plaintiff,

-against-

DAVS PARTNERS LLC AND KALNITECH

CONSTRUCTION COMPANY,

Defendants.

Veritext Virtual

November 17, 2021

12:11 p.m.

EXAMINATION BEFORE TRIAL of STALIN RODRIGO REYES ESPINOZA, the Plaintiff in the above-entitled action, held at the above time and place, taken before Carol Ellinghaus, a Notary Public of the State of New York, pursuant to an Order and stipulations between Counsel.

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Page 2

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BY: ROBERT BRIGANTIC, ESQ.

ALSO PRESENT: Daniel Rodriguez,  
Spanish Interpreter  
Nora Youmans,  
Spanish Interpreter

\* \* \*

Page 58

1                   S. Espinoza

2                 Q. Prior to lunch, we were talking  
3 about your second job while you were  
4 living in the United States of putting  
5 metals or columns for interior walls.

6                 You said you started in or about  
7 January of 2019 and worked there for two  
8 months; correct?

9                 A. Yes.

10                Q. What was the reason you left  
11 that job?

12                A. Because they didn't have any  
13 jobs.

14                Q. What was your next job?

15                A. Working with this gentleman.

16                Q. Working with what gentleman?

17                A. With the company. The company.

18                Q. We are talking about Jim  
19 Associates?

20                A. Yes.

21                Q. When did you start working for  
22 Jim Associates, what month?

23                A. Approximately in May.

24                Q. Of what year?

25                A. 2019.